THE HONORABLE JAMAL N. WHITEHEAD 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON SEATTLE DIVISION 9 CORLIS VERNON, individually and on behalf Case No. 2:23-cv-01180-JNW 10 of all others similarly situated, 11 STIPULATED MOTION FOR **EXTENSION OF TIME** Plaintiff, 12 NOTE FOR MOTION CALENDAR: v. 13 May 29, 2024 CLOSETS BY DESIGN, INC. and CBD 14 FRANCHISING, INC., 15 Defendants. 16 17 18 STIPULATED MOTION 19 Pursuant to LCR 7(d)(1) and LCR (10)(g), Plaintiff Corlis Vernon ("Plaintiff") and Defendants 20 Closets by Design, Inc. and CBD Franchising, Inc. ("Defendants"), hereby submit this stipulated 21 motion to extend the deadlines set forth in the Court's October 31, 2023, Minute Order (Dkt. 22). In 22 support of this motion, the Parties state as follows: 23 1. Plaintiff filed her First Amended Complaint in this Court on October 13, 2023. 24 2. Defendants filed their Motion to Dismiss for Lack of Personal Jurisdiction on 25 November 15, 2023. 26 3. Defendants' Motion is fully briefed and is pending before the Court. 27

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4. On October 31, 2023, the Court issued a Minute Order setting forth the following deadlines regarding class certification:

Event	Date
Affirmative class certification expert disclosures	June 7, 2024
Rebuttal class certification expert disclosures	June 21, 2024
Completion of depositions of class certification experts	July 19, 2024
Deadline to file Motion for class certification	August 16, 2024
Deadline to file Opposition to motion for class certification	September 16, 2024
Deadline to file Reply to motion for class certification	October 16, 2024
Hearing on class certification	To be announced

- 5. Since the Court issued this Order, the Parties have engaged in settlement discussions and have concluded that private mediation will be productive for the early resolution of the case. Accordingly, the Parties have scheduled a mediation before Mr. Bruce Friedman of JAMS on June 19, 2024, the earliest available date that worked for both Parties.
- 6. In light of Defendant's pending Motion to Dismiss and the Parties' upcoming mediation, and in an effort to conserve the Parties' and the Court's resources, the Parties hereby stipulate and agree, subject to the Court's approval, to stay the above deadlines until after the mediation is complete.
- 7. The Parties agree, subject to the Court's approval, that they will update the Court on the outcome of the mediation within 14 days of its completion, and, if the mediation is unsuccessful, provide new proposed dates for the class certification deadlines.
- 8. This is the Parties' first request for an extension of time regarding the class certification briefing schedule, and this stipulation is made in good faith and not for the purpose of causing unwarranted delay.

WHEREFORE, the Parties hereby agree that good cause exists and move the Court to stay the class certification deadlines pending the Parties' mediation and the order on Defendants' Motion to Dismiss.

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ORDER 1 2 As described by the above Stipulated Motion, IT IS SO ORDERED. The Parties' class certification deadlines are hereby stayed pending the Parties' June 19, 2024, 3 mediation. Within 14 days of the mediation, the Parties shall update the Court on the outcome of the 4 mediation and, if the mediation is unsuccessful, provide new dates for the class certification schedule. 5 6 7 Dated on this 30th day of May, 2024. 8 9 10 Jamal N. Whitehead United States District Judge 11 12 13 14 Presented by: 15 s/ Simon Franzini Simon C. Franzini (Cal. Bar No. 287631)* 16 simon@dovel.com DOVEL & LUNER, LLP 17 201 Santa Monica Blvd., Suite 600 18 Santa Monica, California 90401 Telephone: (310) 656-7066 19 Facsimile: (310) 656-7069 20 Wright A. Noel, WSBA No. 25264 Carson & Noel, PLLC 21 20 Sixth Ave. NE Issaquah WA 98027Tel: 425-395-7786 22 Fax: 425-837-5396 23 Email: wright@carsonnoel.com 24 Counsel for Plaintiff 25 *Admitted Pro Hac Vice 26 27